

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Scott Raber and Christine Raber
Debtors

JPMorgan Chase Bank, National Association,
Movant,
v.

Scott Raber and Christine Raber,
Respondents/Debtors,
and
Scott Waterman, Trustee,
Additional Respondent.

CHAPTER 13

BANKRUPTCY CASE NUMBER
20-10707/AMC

**OBJECTION OF JPMORGAN CHASE BANK, NATIONAL ASSOCIATION TO
CONFIRMATION OF DEBTORS' CHAPTER 13 PLAN OF REORGANIZATION**

JPMorgan Chase Bank, National Association, by and through its counsel, Shapiro & DeNardo, LLC, hereby objects to the confirmation of Debtors' Chapter 13 Plan, and in support thereof, avers as follows:

1. On or about February 3, 2020, Debtors filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. Movant holds an allowed claim, secured only by Debtors' principal residence located at 7331 PA Route 873, Slatington, PA 18080.
3. Movant is in the process of filing its Proof of Claim citing arrears in the amount of \$640.98, and a total claim in the amount of \$124,516.52.
4. Debtors' proposed plan calls for the payment to Movant of arrearages in the amount of \$0.00 to be paid to the Trustee through the Plan.
5. The Plan is insufficiently funded to pay Movant its proposed arrearage claim or proposed total debt claim in full.
6. The Plan fails to comply with 11 U.S.C. § 1322.

7. The Plan fails to comply with 11 U.S.C. § 1325.
8. The Court must deny confirmation of Debtors' Chapter 13 Plan.

WHEREFORE, JPMorgan Chase Bank, National Association respectfully requests that confirmation of the Debtors' Plan be denied, that Debtors' bankruptcy petition be dismissed with prejudice; and for such other relief as this Court deems appropriate.

Respectfully submitted,

Dated: March 18, 2020

S&D File #:20-064996

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